

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Telephone Number Portability ) CC Docket No. 95-116

REPLY COMMENTS

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BellSouth Corporation and BellSouth Telecommunications, Inc., by counsel, reply to the comments filed in response to the Notice released in this proceeding on March 14, 1996.<sup>1</sup> As a result of passage of the Telecommunications Act of 1996,<sup>2</sup> and based on the record in this proceeding, the Commission should: (1) establish a national long term number portability ("LTNP") policy; (2) direct the telecommunications industry to establish LTNP technical standards consistent with national policy; (3) initiate a Further Notice of Proposed Rulemaking on LTNP cost recovery; (4) allow LTNP implementation schedules to be determined through local negotiation and state oversight; (5) allow cost recovery issues associated with interim portability measures to be resolved through local negotiation and state regulation; and (6) assure that states do not mandate interim number portability measures on commercial mobile radio service ("CMRS") providers.

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<sup>1</sup> Common Carrier Bureau, *Further Comments Telephone Number Portability CC Docket No. 95-116*, Public Notice DA 96-358 (rel. Mar. 14, 1996) ("Notice").

<sup>2</sup> Telecommunications Act of 1996, Pub. L. 104-104, 110 Stat. 56, enacted Feb. 8, 1996 (the "1996 Act").

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## INTRODUCTION

Most comments identify the five provisions of the 1996 Act that address numbering issues and number portability.<sup>3</sup> The comments, however, vary widely in their analyses of the effect of the 1996 Act on the issues raised by the Commission in its pre-Act NPRM.<sup>4</sup> Many comments fall predictably along competitive lines, and many reiterate earlier filed comments.<sup>5</sup> Two issues in particular, however, received significant attention as a result of experience gained by the industry since the pleading cycle closed. A number of comments focus on LRN as an appropriate technical solution for the kind of number portability required by the 1996 Act.<sup>6</sup> A large number of comments also focused on the need for the Commission to establish number portability cost recovery mechanisms.

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<sup>3</sup> These provisions are set forth in BellSouth's Comments at pp. 2-3.

<sup>4</sup> *In re Telephone Number Portability*, Notice of Proposed Rulemaking, CC Docket No. 95-116, 10 FCC Rcd 12350 (1995) ("NPRM").

<sup>5</sup> Thus, despite the congressional mandate in Section 271(c)(2)(xi) that Bell operating companies ("BOCs") provide remote call forwarding ("RCF") and direct inward dialing trunks ("DID") or other comparable arrangements as an interim number portability measure until the Commission adopts regulations for technically feasible service provider portability, a number of parties reiterate their attacks on these arrangements and seek to leverage this proceeding to delay BOC entry into interLATA markets by adding an additional regulatory gloss to the checklist established by Congress. 1996 Act Section 271(c)(2)(B).

<sup>6</sup> LRN is the acronym for location routing number. As discussed below, LRN is a call process model that is prone to being mischaracterized as a technical solution for LTNP. *Infra.* pp. 3-6.

I. THE LRN CALL MODEL IS NOT A COMPREHENSIVE  
LTNP SOLUTION; IN FACT IT IS ONLY A PART OF LTNP  
IMPLEMENTATION REQUIREMENTS

The 1996 Act is silent as to the selection of an appropriate technical solution for LTNP. Advocates of LRN draw upon experience gained in various state number portability proceedings and in industry fora in the time since the pleading cycle closed. BellSouth and others noted in their comments that several states have endorsed LRN in the context of number portability proceedings, and that no other viable call model has emerged.<sup>7</sup> There is near-unanimous agreement on the LRN's advantages. However, many commenters misapprehend LRN, a call model, as a comprehensive LTNP solution.<sup>8</sup>

It is crucial that the Commission appreciate that selection of LRN as a call model is not synonymous with selecting LRN as a LTNP technical solution which will resolve all issues surrounding number portability.<sup>9</sup> Accepting, as BellSouth does, LRN's inevitable role in LTNP as the call model of choice, complex operational and engineering problems

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<sup>7</sup> See, e.g., BellSouth Comments at 5.

<sup>8</sup> The confusion is demonstrated by the variety of ways by which the LRN call process model is described by commenters: as a "permanent solution", AT&T Comments at 3; as an "implementation method", NYSDPS Comments at 1; as a "mechanism", Cox Comments at 8; as a "solution", Pacific Bell Comments at 2, USTA Comments at 3, et. al; as an "addressing scheme", NYNEX Comments at 5; as a "system", Sprint Comments at 2; as a "call model", TRA Comments at 6; as an "approach", ALTS Comments at 5, MCI Comments at 4; as an "architecture", Ameritech Comments at 8; and as a "proposal", GTE Comments at 5. This inability of the industry to describe LRN in a uniform manner demonstrates that, notwithstanding LRN's obvious advantages as a call model that will undoubtedly play an integral role in LTNP, the industry itself has not yet reached consensus on the scope of LRN advantages and limitations. See NYNEX Comments at 5; See also GTE Comments at 5-6.

<sup>9</sup> See NYNEX Comments at 5.

posed by widespread deployment of LTNP across a wide variety of switches and network architectures as identified by BellSouth and others in the original pleading cycle remain to be resolved as the industry works toward a LTNP solution.<sup>10</sup> For example, the issue of where and how queries are to be launched exists independently of the selection of a particular call model and needs further evaluation. Neither the Commission nor the industry need to select any single triggering mechanism to effectuate LTNP; carriers should be able to specify the triggering mechanism most appropriate for use on their own networks. Further, service control points necessary to ensure that calls are routed properly must be developed and deployed, and service management system issues need to be resolved in order to truly implement a fully integrated LTNP solution.

## **II. NEITHER THE 1996 ACT, NOR PROGRESS MADE TOWARD LTNP, COMPEL A FEDERALLY MANDATED IMPLEMENTATION TIMETABLE**

The need to resolve remaining technical and operational issues underscores the fact that the Commission should reject all proposals to mandate specific implementation dates for LTNP. There is no congressional imperative to implement LTNP by a date certain; rather, LTNP is to be implemented by a single class of carriers when technically feasible and when its costs can be borne by all classes of telecommunications carriers in a competitively neutral manner. The 1996 Act merely requires the Commission to “complete all actions necessary to establish regulations to implement the requirements [for technically feasible, service provider number portability within a limited geographic area]

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<sup>10</sup> BellSouth Comments (Sept. 13, 1995), pp. 35-46. Both NYNEX and GTE, in their further comments, describe a number of issues that remain to be resolved with LRN.

of this [LEC-interconnection] section” by August 8, 1996.<sup>11</sup> Contrary to the implications of some commenters, Section 251 of the 1996 Act does not require LTNP implementation by a date certain or prior to a grant of relief under Section 271. The conspicuous absence of a congressional mandate for an implementation time frame constitutes express recognition by Congress that development of a technically feasible, competitively neutral LTNP solution may, necessarily, take some time.

Although the industry is using its best efforts to implement number portability in accordance with the target dates established by state regulators, these aggressive implementation schedules may need to be adjusted slightly to take into account drafting requests for proposals, vendor availability, adequate testing intervals, and other issues. For instance, in Georgia, where BellSouth has been an active participant, efforts to understand the impacts of number portability in the areas of intercompany information flows, rating and billing, and impacts on operator services, especially those utilizing line information database (“LIDB”) are in their early stages. It is absurd to think that a federally mandated implementation date will allow all participating carriers in all locations to adequately test both ported and non-porting switches to assure seamless interoperability and non-impairment of quality, reliability and convenience. The 1996 Act requires functionality without impairment as well as technical feasibility; it does not require an implementation date.

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<sup>11</sup> 1996 Act, Section 251(d)(1).

MCI argues that a date certain for LTNP should be established as it was for 800 number portability.<sup>12</sup> MCI overlooks the significant differences between 800 service number portability and LTNP: (1) 800 service technology and architecture were already in place, whereas LTNP technologies and architectures are still the subject of state proceedings; (2) the 800 industry participants were provided ample time to develop implementation plans that included intercompany testing process; (3) an N3P-SMS system for all companies to interconnect with was in place and only required deployment of a number administration service center, whereas with LTNP database systems need to be developed; (4) 800 services involved a mature, relatively small segment of a highly developed commercial services market, whereas LTNP involves POTS end-user customers on an unprecedented scale; and (5) the Commission provided a cost recovery mechanism for the costs of providing 800 service number portability, whereas no such system has been established for LTNP.

**III. THE COMMISSION MUST ADDRESS THE ISSUE OF LTNP COST RECOVERY IMMEDIATELY IN A FURTHER NOTICE OF PROPOSED RULEMAKING**

The 1996 Act makes clear that while the cost recovery issues relating to interim arrangements should be left to the states, the Commission is to ensure that the cost of establishing LTNP shall be borne by all telecommunications carriers in a competitively neutral basis *as determined by the Commission*.<sup>13</sup> Thus the Commission should take immediate action to address cost recovery issues relating to LTNP in this proceeding. As

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<sup>12</sup> MCI Comments at 6.

<sup>13</sup> 1996 Act, Section 251(e)(2) (emphasis added).

noted above, while the 1996 Act does not require the Commission to mandate a particular LTNP technical solution, it does require that the costs of establishing number portability be borne by all telecommunications carriers on a competitively neutral basis as determined by the Commission. The actual costs of LTNP cannot be determined until a truly technically feasible solution and all related deployment requirements are identified.<sup>14</sup> Vendors cannot quote prices until the technologies upon which they are expected to build become clear. Service providers cannot complete financial analyses until they understand the fundamental levels of service performance expected and how implementation is to take place. The costs posed to incumbent local exchange carriers ("LECs") is necessarily different from those posed to new entrants: incumbents must replace an extensive system of existing switches or develop a work around to accommodate a lack of capability in existing switches, and, in addition, adapt existing operating systems to adjust to new interconnection arrangements. Incumbent LECs remain subject to federal and state regulatory restraints in terms of pricing and cost recovery that are not factors for new entrants. A number of commenters have documented the extensive costs of LTNP that will affect incumbent LECs, yet the proposals put forth by commenters to date hardly qualify as anything remotely resembling competitive neutrality.

Thus, the Commission, in the Order it issues in this proceeding, should seek comment on how costs are to be borne by all carriers on a competitively neutral basis. It should adopt a tentative conclusion that no class of telecommunications carrier should be competitively disadvantaged by LTNP deployment. Because some commenters

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<sup>14</sup> NYNEX Comments at 5.

advocate that each carrier bear its own infrastructure costs, the Commission should consider the types of infrastructure costs of all classes of carriers, not just incumbent LECs, in order that massive financial burdens are not imposed on particular classes of carriers.<sup>15</sup> It should specifically seek comment on the extent to which classes of carriers which are not required to participate in LTNP will bear costs relating to LTNP. It should further conclude that Congress's specific endorsement of interim RCF and DID arrangements, and the 1996 Act's structure of requiring state-approved carrier negotiations for interconnection agreements, compels that RCF and DID cost recovery mechanisms be left for resolution to the states.<sup>16</sup>

BellSouth has advocated in this proceeding that the Commission undertake to resolve the difficult cost recovery issues attendant upon LTNP once the industry has proposed a specific LTNP technical solution that meets the criteria established by the Commission. Based on passage of the 1996 Act and the rapid progress made in state proceedings, and the number of proposals advanced by commenters, BellSouth believes that the Commission is in a position to begin addressing LTNP cost recovery immediately through a further notice of proposed rulemaking issued simultaneously with a report and order establishing a national LTNP policy as well as an industry effort to recommend the appropriate technical solution to achieve the national policy.

Finally, as clarification, BellSouth stated in its comments, "[a]s long as CMRS providers are not recognized by Congress as facilities-based competitors to the BOCs

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<sup>15</sup> Pacific Bell Comments at 7.

<sup>16</sup> Ameritech Comments at 7, n.11.



pursuant to Section 271(c)(1)(A), CMRS providers should not be obligated with the burdens of number portability.” Section 271(c)(1) provides that “[f]or purposes of ... [subparagraph [(c)(1)(A)] services provided pursuant to Subpart K [sic] of Part 22 of the Commission’s regulations (47 CFR § 22.901 *et seq.*) shall not be considered to be telephone exchange services.” Thus, it is only cellular service providers who are specifically considered not to be facilities based competitors to BOCs for the purposes of Section 271(c)(1)(A). Nevertheless, the record to date indicates that interim number portability arrangements should not be imposed on CMRS providers.

### CONCLUSION

The Commission should recognize that LRN is not a comprehensive LTNP solution. Nothing in the 1996 Act or in the record developed in this proceeding requires the FCC to interfere with the ongoing and highly successful state number portability proceedings through federally mandated technical requirements or implementation schedules.<sup>17</sup>

The Commission can best fulfill its obligations under the 1996 Act by issuing a Report and Order in which it establishes a national LTNP policy to guide these state efforts and also establishes an industry work group tasked to recommend a LTNP technical solution consistent with the Commission’s policy. The Commission should issue a Further Notice of Proposed Rulemaking seeking comment on how to implement the

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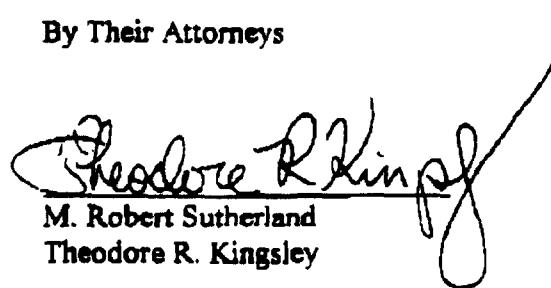
<sup>17</sup> Georgia Public Service Commission Comments at 1-3.

1996 Act's mandate that the costs of number portability shall be borne by all telecommunications carriers on a competitively neutral basis.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this 5th day of April, 1996 served all parties to this action with a copy of the foregoing **REPLY COMMENTS** by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties listed on the attached service list.

  
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